

Chen, Isaac

From: Chen, Isaac
Sent: Monday, December 14, 2015 8:46 AM
To: Houston, Robert
Cc: Bogdan, Silvia
Subject: FW: NPDES Guideline Clarification (BP)

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From: Michael Petrinic [mailto:MPetrinic@Technip.Com]

Sent: Tuesday, December 08, 2015 4:52 PM

To: Houston, Robert; Angove, Sharon

Subject: NPDES Guideline Clarification

Robert, Sharon,

Thank you for the call today, and helping me out with my project. I have included the specifications of my project (only relevant sections) that I currently have – pigging with filtered seawater treated with UV colorless dye only (only NPDES Toxicity Test approved chemicals will be used). We will like to pig with a chemical that could potentially be more toxic (AQUASWEEP SRC4132), but may be filtered with Bentonite Clay.

Our plan with this new chemical is to use a filtration skid subsea, connected to the DC41 PLETs (as indicated in the provided document). Since the entire operation will be subsea, we plan on conducting a toxicity test prior to using the chemical (based on the statement contained in the NPDES permit: “In cases where the discharge point for hydrostatic test water is subsea, such as the subsea end of a pipeline, and it is impractical to collect a sample at the discharge point, operators may collect a sample for this monitoring requirement prior to use of the fluid.”). However, this toxicity test will not be of the pure chemical being injected – **we will conduct a function test of the where we flow the chemical with seawater through the exact filtration skid in Houston, collect a sample from the discharge port, and conduct a toxicity test of this sample.** Will this method be allowed and approved by the EPA under this permit?

Also I read in the NPDES permit that “Note: Discharges treated by bromide, chlorine, or hypochlorite are not required for toxicity tests” – what does this mean? My interpretation is if we use a toxic chemical (say Glutaraldehyde), and we inject any one of those chemicals, does that mean the toxicity test is not required for the Glutaraldehyde, or the discharge mixture?

If there is anything that may be confusing, please let me know. Thank you.

Regards,

Michael Petrinic

Subsea Pre-Commissioning Specialist

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